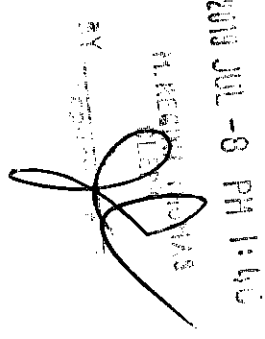


UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

<b>IN RE:</b>  <b>HELEN CAIN DOYLE</b>  <b>Debtor</b>	<b>CASE NO. 19-20124-JRS</b>  <b>Chapter 7</b>
<b>FIRST AMERICAN TITLE INSURANCE COMPANY and GMAC MORTGAGE, LLC,</b>  <b>Plaintiffs</b>  <b>Vs.</b>  <b>HELEN CAIN DOYLE a/k/a HELEN ELIZABETH DOYLE a/k/a ELIZABETH C. DOYLE; JEFFREY L. FREELAND; GEORGIA RECOVERY SERVICE, INC.,</b>  <b>Defendants</b>	<b>ADVERSARY PROCEEDING CASE NO. 19-2022</b>  

**JOINT RESPONSE TO THE ORDER AND NOTICE OF RULE 26(f) CONFERENCE**

Ms. Doyle is representing herself with the assistance of Janice McKay who is NOT AN ATTORNEY AND NOT A LEGAL REPRESENTATIVE NOR HAS TRAINING TO BE EITHER. Ms. McKay is only able to help Ms. Doyle with organizing, reading, and typing her responses to the best of a layperson's ability.

Ms. Doyle does not know enough about the law to understand her options in this proceeding. She does not wish to lose any of her rights or options in this proceeding. Ms. Doyle asks the judge to keep her lack of legal knowledge in mind when making his rulings.

Mr. Freeland had retained an attorney to handle the initial lawsuit filed in Dawson County. The Plaintiffs were aware of this fact and had been in touch with the attorney. However, since filing the Adversary Proceeding Case No. 19-2022, the Plaintiffs have not served any papers to Mr. Freeland's Attorney nor have they responded to the attorney's attempts to contact them. Prior to the Adversary Proceeding, there had been discussions of a settlement.

Ms. Doyle and Mr. Freeland are uncomfortable signing the document that the Plaintiffs prepared. The Plaintiffs appear to be avoiding the attorney and forcing Mr. Freeland to spend additional time and money when he has to contact and provide copies of correspondences to the attorney. This is compounded by the fact that Ms. Doyle can not afford any legal help and does

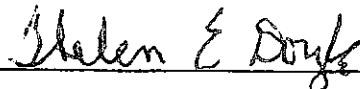
not qualify for free or reduced legal assistance. This creates confusion and delays during each step of the process and places the defendants at a great disadvantage.

Mr. Freeland asks the court and the Plaintiffs to include his attorney in all future correspondences. His contact information is:

Robert Land, Attorney at Law  
One North Parkway Square  
4200 Northside Parkway Ste 200  
Atlanta, Georgia 30327  
(404) 237-2500

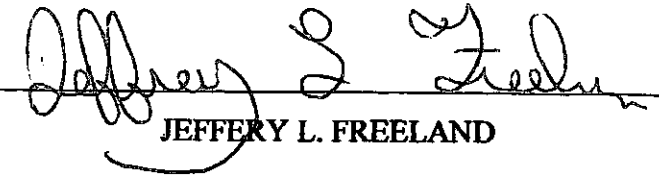
Georgia Recovery Service, Inc (GRS) is represented by Mr. Freeland. Mr. Freeland is the sole owner and CEO of GRS.

Submitted by:

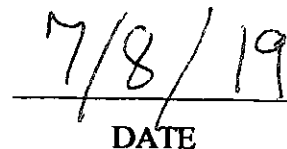


HELEN CAIN DOYLE

DATE

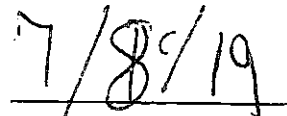


JEFFERY L. FREELAND



DATE

  
GEORGIA RECOVERY SERVICE, INC  
BY: JEFFERY L. FREELAND, SOLE OWNER  
AND CEO



DATE

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

IN RE: *Helen Cain Doyle* ) Case No: *19-20124-JRS*  
)  
) Chapter *7*  
) *Adversary Proceeding Case No.*  
) *19-2022*

Debtor(s)  
Plaintiff: *First American Title Insurance Company*  
*GMAC Mortgage, LLC*  
VS

CERTIFICATE OF SERVICE

Defendants: *Helen Cain Doyle, Jeffery L. Freeland,*  
*Georgia Recovery Service, INC*

I, the undersigned, hereby certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 year of age, and that on the *8<sup>th</sup>* day of *July*, 2019, I served a copy of

*Response to Order of Rule 26(f) from Defendants Jointly*

which was filed in this bankruptcy matter on the *8<sup>th</sup>* day of *July*, 2019.

Mode of service (check one):

☒ MAILED

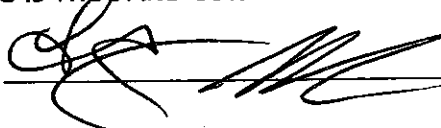
☐ HAND DELIVERED

Name and Address of each party served (If necessary, you may attach a list.):

*Monica K. Gilroy* / *Both at:*  
*Mathew E. Toten* / *Suite 140*  
*3780 Manselle Rd*  
*Alpharetta, GA 30022*

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: *07/08/2019*

Signature: 

Printed Name: *Janice McKay*

Address: *254 Freeland Rd*  
*Dawsonville, GA 30534*

Phone: *(404) 284 6144*